

**AFFIDAVIT IN SUPPORT A CRIMINAL COMPLAINT**

I, Austin Johnston, a Special Agent (SA) with the Federal Bureau of Investigation (hereinafter “FBI”), Cleveland Division, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C § 2516. I have been trained in advanced investigative techniques and have satisfied all requirements defined by the Federal Criminal Investigator Classification series established by the U.S. Office of Personnel Management.

2. I have been employed by the FBI as a Special Agent since January of 2020 and am currently assigned to the Cleveland division, Canton Resident Agency, Canton, Ohio, Safe Streets Task Force and Violent Crime Squad. While in this role, I have also assisted the divisions Child Exploitation Task Force in the investigation of federal criminal violations related to violent crime against children and the FBI’s Innocent Images National Initiative. I have participated in all of the usual methods of investigation including, but not limited to, financial analysis, physical surveillance, service of subpoenas, electronic device imaging and analysis, cooperating witnesses, confidential human sources, telephone toll record and internet protocol (IP) analysis, interception of wire and cellular telephone communications, consensual monitoring, seizing evidence, and the execution of search and arrest warrants. I have gained experience through training at the FBI Academy in Quantico, Virginia, and everyday work relating to conducting these types of investigations. Prior to the FBI, I was employed by Texas Department of Public Safety since 2016.

3. Over the course of my employment as an FBI Special Agent I have conducted and participated in multiple criminal investigations that have resulted in arrests for violent criminal offenses including those involving children. These crimes resulted in subsequent convictions in Federal Courts.

4. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that Feldon Jose Norwood aka “Zay” (hereafter referred to as “Norwood”) date of birth April XX, 2000 (redacted), residing at XXXX Fenton Ave NE, Canton, OH 44704 (redacted) has violated 18 U.S.C. § 2252(a)(1) - Transportation of Visual Depictions of Minors Engaged in Sexually Explicit Conduct; violated 18 U.S.C. § 2252(a)(3) - Advertisement of Visual Depictions of Minors Engaged in Sexually Explicit Conduct; and violated 18 U.S.C. § 2252(a)(4) - Sale of Visual Depictions of Minors Engaged in Sexually Explicit Conduct.

5. The statements in this affidavit are based in part on information and evidence provided by other law enforcement officers, analysis of law enforcement databases, evidence obtained in other state and federal criminal investigations, written reports about this case, examination of records from commercial and FBI databases, administrative subpoenas, the execution of a federal search warrants, voluntarily provided records from communication providers, FBI physical surveillance, a search of Norwood’s residence and person, an interview of Norwood, and on my investigation of this matter. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause for the requested complaint.

6. Starting in July 2022, and most recently as of March 2023, FBI Canton received 110 CyberTips through the Ohio Internet Crimes Against Children Task force (OICAC) indicating that a user may be engaged in the possession/distribution of child pornography. Of the 110 tips, all were

reportedly linked to the same internet protocol (IP) address, registered to the same residence. The National Center for Missing and Exploited Children (NCMEC) received tips from two electronic service providers, that Gmail accounts with the following registered email addresses were engaging in the suspected possession, solicitation and/or distribution of child sexual abuse material:

- a) Chrisreddfj@gmail.com
- b) Jameshustondj@gmail.com
- c) Timj80230@gmail.com
- d) GarynJames621@gmail.com
- e) Jujusmi44@gmail.com
- f) Kevingjsmith@gmail.com
- g) l8419127@gmail.com
- h) Krissmith4816@gmail.com
- i) Timjerry427@gmail.com
- j) Jay841898@gmail.com
- k) Des40082@gmail.com

7. In July 2022, Reddit, Inc began submitting CyberTips to the National Center for Missing and Exploited Children (NCMEC), totaling 109. In October 2022, Twitter, Inc submitted CyberTip #137051911 to NCMEC.

8. On July 17, 2022, at 17:54:21 UTC, Reddit user “AdReasonable4558”, utilizing IP address 108.249.15.137 with a verified email address of chrisreddfj@gmail.com posted a thread with the advertisement content of “CP Pyt fc n other content DM \$10 over 3000 files”. The Affiant believes this to be an offer of child pornography for sale and that the user has over 3000 files, “Child porn for sale

and other content, direct message”. According to NCMEC, IP address 108.249.15.137 was associated with approximately 138 additional NCMEC reports. A cross reference of NCMEC reports received by Reddit and associated with IP address 108.249.15.137 showed the following Gmail accounts linked to the violating IP: Jay841898@gmail.com, Jameshustondj@gmail.com, jujusmi44@gmail.com and timj80230@gmail.com.

9. Information contained within CyberTip 152294293 indicated on August 27, 2022, at 3:43:22 UTC, a Reddit account associated with Gmail address JamesHustondj@gmail.com, utilizing IP address 108.249.15.137, posted an advertisement with the content “pyt n cp n other content folders \$10-\$100”. The Affiant believes this post to be an offer to sell child pornography, “Porn and child porn and other content”. This user, with the same verified email address, utilizing the same IP address made multiple other posts advertising the same content.

10. Information contained within CyberTip 154481713 indicated on September 21, 2022, at 17:27:27 UTC, a Reddit account associated with Gmail address Jujusmi44@gmail.com, utilizing IP address 108.249.15.137, posted an advertisement with the content “pyt n cp n other content folders \$10-\$100”. The Affiant believes this post to be an offer to sell child pornography, “porn and child porn and other content”. This user, with the same verified email address, utilizing the same IP address made multiple other posting, advertising the same content.

11. Information contained within Cybertip 153113104 indicated on September 22, 2022, at 7:36:46 UTC, a Reddit account associated with Gmail address timj80230@gmail.com, utilizing IP address 108.249.15.137, posted an advertisement with the content “pyt n cp n other content folders \$10-\$100”. The Affiant believes this post to be an offer to sell child pornography, “porn and child porn and

other content”. The user also uploaded four files depicting various folders titled with abbreviations.

Affiant reviewed the files, and one is depicted below using the original file name:

a. **Title:** 44947b3562406e473c214c614e649b59

**Description:** Depicts a folder titled “Child Hardcore (100 Videos)”, containing multiple mp.4 files of nude pre-pubescent children.

12. Information contained within CyberTip 154908941 indicated on October 7, 2022, at 3:24:37 UTC, a Reddit account associated with Gmail address Jay841898@gmail.com, utilizing IP address 108.249.15.137, posted an advertisement with the content “Peep my page for preview, pyt cp n other content folders \$10-\$100”. Again, the Affiant believes this post to be an offer to sell child pornography, “porn and child porn and other content”. This user, with the same verified email address, utilizing the same IP address made multiple other posting, advertising the same content.

13. October 18, 2022, at 21:39:15 UTC, Twitter user “ChrisRe53309238”, utilizing IP address 108.249.15.137 with a verified email chrisreddfj@gmail.com posted a message with the content: “Hit me I got hella pyt n cp n other content folders \$10-\$100 DM me on insta @chri\_sredd or on snap @chrisredd22 or on twitter @ChrisRe53309238 or on Discord chrismjredd#9935”. The Affiant again believes this to be an offer to sell child pornography, “I got a lot of porn and child porn and other content folders”.

14. Information contained within CyberTip 137051911 indicated that Twitter identified 4 files associated with Twitter user “ChrisRe53309238”, with associated email address chrisreddfj@gmail.com that were posted on Twitter. Affiant reviewed the files and two of which, are depicted below using the original file name:

a. **Title:** FfyfEutX0AUslYz.jpg

**Description:** Depicts a folder containing 8 thumbnails, one thumbnail is titled “8 yo and 9 yo preteen girlfriends”. An additional thumbnail is titled “10y Petite Thai Preteen”.

b. **Title:** FfyfEupXwAg5p1W.jpg

**Description:** Depicts a folder containing four images and one folder. The folder is titled “Child Hardcore (100 videos)”.

15. On November 16, 2022, a grand jury subpoena was submitted to AT&T for account information associated with internet protocol (IP) address (108.249.15.137) which was associated with all of the NCMEC reported Cybertips, believed to be engaged in the possession/distribution of CSAM. AT&T provided the following subscriber information:

- a. Account Name: Mamie Jones
- b. Service/Billing Address: XX (redacted) Fenton Ave NE, Canton, OH 44704
- c. Length of Service: 01/14/2013 – Present
- d. Contact Phone: (XXX) XXX-2166

16. Upon review of all CyberTips associated with IP address 108.249.15.137, it was discovered that approximately 11 Gmail accounts had been reported to be associated with Reddit accounts engaging in the advertisement and distribution of child sexual abuse material.

17. On November 17, 2023, United States Magistrate Judge Amanda M. Knapp, of the Northern District of Ohio, issued a residential search warrant for XX Fenton Ave NE, Canton, OH 44704. At approximately 11:30 AM on November 17, 2023, the warrant was executed at the issued residence. Subsequent to the residential search warrant, a consensual interview of Feldon Norwood was conducted at the FBI Canton Resident Agency. Norwood stated that throughout the time frame or the

reported CyberTips, he posted Mega links on several platforms to include Discord and Reddit, in return for payment. Norwood initially stated he received Mega links from a Discord user by the name of “Aperuntz” through Telegram, which he then distributed to online platforms for money. Norwood was aware that links included child pornography and further acknowledged that the acronym “PYT” stood for pretty young teens. Through investigative measures, it was later determined Norwood had in fact created the Mega links himself. Norwood was shown 11 email addresses that were reported (see paragraph 6) by Reddit to be associated with the advertisement and distribution of child sexual abuse material. Norwood acknowledged the address and admitted to being the creator.

18. During the interview of Norwood on November 17, 2023, Norwood was questioned regarding the content of the distributed Mega links. Norwood advised he saw children as young as 13 years old and was 100% certain it included children under the age of 12. Norwood had at one point created a Mega account, but it had been banned (see paragraph 19). Norwood recalled seeing folders, which contained nearly 1000 files and admitted to distributing child pornography Mega links on Twitter for \$10, \$20 and \$200. Norwood believed some of the content he shared consisted of children around 8 or 9 years of age. Norwood stated all accounts related to the distribution of child pornography had since been deleted, and he no longer possessed the account on any of his electronic devices.

19. On November 17, 2023, Norwood consented to a polygraph. During the course of the polygraph, Norwood admitted to creating a server on Discord and Telegram in which he uploaded 10-29 images and videos of pornography. Although the pornography was a mix of both adults and children, Norwood recalled some of the boys and girls in the images/videos did not have pubic hair, nor had they gone through puberty. Norwood alleged he had direct messaged between 10-20 individuals online who wanted to purchase child pornography. Norwood would then direct the individuals to the servers he

created which housed child pornography. Throughout this time, Norwood was paid by individuals for providing them child pornography.

20. On November 29, 2023, affiant conducted a manual review of evidence items seized from the executed search warrant on November 17, 2023 at Norwood's residence. During a review of an Apple Iphone seized from Norwood and subsequently acknowledged by Norwood to be his, an image file ending in 93677 showed an HTML link titles "CP PYT Incest". This file appeared to be a screenshot image from a notepad application. A review of file number ending in 5791A showed a Telegram application chat thread with the chat room titled "Pretty girl teens". Upon review of Discord chat logs from July 5, 2022, at 3:22:39 PM UTC, the username Chrismjredd (see paragraph 8 & 14) posted a message saying "I got more shit tap in", and included a Mega link (the link has been redacted). An online search and subpoena of the provided Mega link showed the link was removed from the server for containing objectionable content, such as child exploitation material.

21. On January 2, 2024, affiant received subpoena results related to the Mega link Norwood distributed on July 5, 2022. Mega provided the following account information:

- a) Account Creation Email: Zayjjones@gmail.com
- b) Creation and Login IP: 108.249.15.137

Norwood who utilizes the nickname Zay, would later confirm on January 18, 2024 (see paragraph 21), that the aforementioned email was his. The creation IP address reported by Mega was also the identical IP reported by all electronic service providers related to each Cyber Tip.

22. On January 18, 2024, Norwood was interviewed at the FBI Canton Resident Agency for a second time. Norwood advised the affiant he was paid between \$10-\$100 on CashApp for the child pornography he distributed to each user. Norwood indicated the CashApp he used at the time held a



partial username of “ZayJones”; and further acknowledged he prefers to be referred to as “Zay”. In total, Norwood believed he received between \$2,500 and \$5,000 for distributing child pornography. Norwood estimated there were around 200 videos containing child sexual abuse material.



**CONCLUSION**

23. Based on the above information, probable cause exists that Feldon Jose Norwood has violated 18 U.S.C. § 2252(a)(1) - Transportation of Visual Depictions of Minors Engaged in Sexually Explicit Conduct; violated 18 U.S.C. § 2252(a)(3) - Advertisement of Visual Depictions of Minors Engaged in Sexually Explicit Conduct; and violated 18 U.S.C. § 2252(a)(4) - Sale of Visual Depictions of Minors Engaged in Sexually Explicit Conduct.

FURTHER AFFIANT SAYETH NOT



Austin Johnston, Special Agent  
Federal Bureau of Investigation  
Canton, Ohio

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1, on this 26th day of January, 2024.



AMANDA M. KNAPP  
United States Magistrate Judge